



# The Commonwealth of Massachusetts

## DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

### SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO CAMBRIDGE ELECTRIC LIGHT COMPANY AND COMMONWEALTH ELECTRIC COMPANY d/b/a NSTAR ELECTRIC DTE 03-118/04-114

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Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Cambridge Electric Light Company ("Cambridge") and Commonwealth Electric Company ("Commonwealth") d/b/a NSTAR Electric (collectively, "the Companies") its Second Set of Information Requests in the matter docketed as 04-114.

#### **Requests**

- DTE 2-1      Please refer to the Companies' response to DTE-1-3 (c) filed on April 1, 2005. Explain why the Companies believe that the "generation-market-pricing issues being considered by FERC" would not have been considered absent restructuring, given that not all states have restructured their electric companies.
- DTE 2-2      Please refer to the Companies' response to DTE-1-3 (d) filed on April 1, 2005. In the response, the Companies state: "since legal expenses relating to market issues are being incurred on behalf of customers to mitigate generation related costs, the Companies are entitled to recover these costs." Explain how the Companies' intervention in a FERC proceeding, in which future costs may be imposed on retail customers, affects the mitigation of generation related assets that have been divested and therefore no longer obligate the Companies to incur the costs of operating those assets.
- DTE 2-3      Please refer to the Companies' response to DTE-1-3 filed on April 1, 2005. The Department recognizes the Companies' stewardship responsibilities to customers. Given that the Companies are, in the post-restructuring period, responsible for procuring power for their Basic Service customers, explain how costs related to "generation market pricing issues" are appropriately recovered in the transition charge rather than in some other rate component.

- DTE 2-4      Please refer to the Companies' response to DTE-1-3 filed on April 1, 2005. Please explain how these legal costs relate to and/or will result in a mitigation of costs that are currently being recovered through the transition charge.
- DTE 2-5      Please refer to the Companies' responses to DTE-1-9 and DTE-1-10. Explain why the Seabrook generating station was not included in these responses.